

Romaine C. Marshall (9654)
Jose A. Abarca (12762)
Jonathan E. Schmalfeld (admitted *pro hac vice*)
POL SINELLI PC
2825 E Cottonwood Pkwy, Suite 500
Salt Lake City, UT 84121
Telephone: (801) 999-3504
rmarshall@polsinelli.com
jabarca@polsinelli.com
jschmalfeld@polsinelli.com

*Attorneys for Defendants iX Global, LLC, Joseph A. Martinez,
and Travis Flaherty*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DIGITAL LICENSING INC. dba DEBT Box,
a Wyoming corporation, et al.,

Defendants/Relief Defendants.

**DEFENDANTS IX GLOBAL, LLC,
JOSEPH A. MARTINEZ, AND
TRAVIS FLAHERTY'S UNOPPOSED
MOTION FOR LEAVE TO FILE A
REPLY TO THE SEC'S RESPONSE
TO THE COURT'S NOVEMBER 30,
2023 ORDER TO SHOW CAUSE**

Case No. 2:23-cv-00482-RJS-DBP
Chief Judge Robert J. Shelby
Magistrate Judge Dustin B. Pead

Pursuant to DUCivR 7-1(a)(9), Defendants iX Global, LLC, Joseph A. Martinez, and Travis Flaherty (“iX Global Defendants”), through counsel of record, hereby move the Court to grant leave to the iX Global Defendants, and any other Defendants or Relief Defendants who wish, to file a reply to Plaintiff Securities and Exchange Commission (“SEC”)’s Response (the “SEC

Response") to the Court's November 30, 2023 Order to Show Cause Why the Court Should Not Impose Sanctions (the "Show Cause Order"). Dkt. Nos. 215 and 233.

In addition to the arguments raised by the DEBT Box Defendants (*see* Dkt. No. 238), which the iX Global Defendants incorporate by reference pursuant to DUCivR 7-1(a)(7), the iX Global Defendants additionally have an interest in presenting this Court a full and complete record for the Court's determination regarding the Show Cause Order. The *ex parte* TRO was entered uniformly against all Defendants and Relief Defendants, largely without any level of individualized relief against the eighteen named Defendants or ten named Relief Defendants. Counsel for the iX Global Defendants respectfully request that the same leave that was granted to the DEBT Box Defendants (Dkt. No. 239) also be granted to the iX Global Defendants, and any other Defendant or Relief Defendant in this action, regarding the Court's Show Cause Order.

Counsel for the iX Global Defendants have met and conferred with counsel for the SEC regarding this Motion and the SEC takes no position on the instant Motion.

Based on the foregoing, iX Global Defendants respectfully request that all Defendants and Relief Defendants be granted leave to file a reply to the SEC Response, and for that reply to be up to twenty pages to be filed on or before January 12, 2024.

Dated: December 26, 2023

POLSINELLI PC

/s/ Jose A. Abarca

Romaine C. Marshall
Jose A. Abarca
Jonathan E. Schmalfeld

*Attorneys for Defendants iX Global, LLC,
Joseph A. Martinez, Flaherty Enterprises,
LLC, and Travis Flaherty*

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 2023, the foregoing document was served
via CM/ECF to all counsel of record.

/s/ Kaitlin Morgan _____